

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA, *ex rel.*  
GNGH2,

Plaintiffs.

FILED UNDER SEAL  
Civil Action No. 24-cv-661

v.

ZUND AMERICA, INC.,

Defendant.

---

United States' Notice of Election to Intervene for Settlement

---

Pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(2) & (4), the United States of America notifies the Court of its decision to intervene in this action for settlement purposes with Defendant Zund America, Inc.

The United States, Zund America, Inc., and the relator, GNGH2, Inc., have executed a settlement agreement to resolve this matter. The settlement agreement requires Zund America, Inc., to make the settlement payment within 14 days, and upon receipt of the settlement payment by the United States, the United States and the relator will file a notice of voluntary dismissal in this action.

Finally, the United States requests that the relator's complaint, this notice, and the attached proposed order be unsealed. The United States requests that all other papers on file in this action remain under seal because, in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

Dated this 4th day of December, 2024.

GREGORY J. HAANSTAD  
United States Attorney

By: /s/ Michael A. Carter

MICHAEL A. CARTER  
Assistant United States Attorney  
Eastern District of Wisconsin  
State Bar No. 1090041  
517 East Wisconsin Avenue  
Milwaukee, WI 53202  
(414) 297-4101  
Fax: (414) 297-4394  
[Michael.A.Carter@usdoj.gov](mailto:Michael.A.Carter@usdoj.gov)